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May 28, 2020

*Via ECF*

Hon. Peggy Kuo  
United States Magistrate Judge  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

Re: *Rosenfeld, et al. v. Lenich, et al.*, No. 18 Civ. 6720 (NGG)(PK)

Your Honor:

Along with Wiggin & Dana LLP, this firm represents Plaintiffs in the above-captioned action. We write jointly with Joshua Lax, counsel for the City Defendants, to respectfully request that the Court extend the deadline for the parties to file a motion for preliminary approval of their anticipated settlement from May 29, 2020 to June 26, 2020. This is the third request for such an extension.

The parties have been working diligently to resolve the numerous significant issues surrounding the terms and administration of the anticipated settlement. We have exchanged multiple drafts of a lengthy settlement agreement, had several phone calls with one another, and secured quotes from prospective class administrators. Notwithstanding this progress, some disputed issues still remain. The parties are working collaboratively despite certain challenges and obstacles posed by the current pandemic and are hopeful they can resolve the outstanding issues within the next two weeks and file a motion for preliminary approval by the end of June.

The parties thank the Court for its continued consideration.

Respectfully submitted,

/s

Samuel Shapiro

c. All counsel of record, *via ECF*